UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

ROSY GIRON DE REYES; JOSE DAGOBERTO REYES; FELIX ALEXIS BOLANOS; RUTH RIVAS; YOVANA JALDIN SOLIS; ESTEBAN RUBEN MOYA YRAPURA; ROSA ELENA AMAYA; and HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP; WAPLES PROJECT LIMITED PARTNERSHIP; and A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

MOTION TO STRIKE THE EXPERT REPORT AND EXCLUDE THE TESTIMONY OF GEORGE C. CARUSO

Pursuant to Rule 702 of the Federal Rules of Evidence and Local Civil Rule 7, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs"), by and through their attorneys, hereby move to strike the Expert Report of George C. Caruso in full, and exclude Mr. Caruso's testimony, for the reasons set forth in Plaintiffs' supporting Memorandum of Law.

Pursuant to Local Civil Rule 7(E), counsel for Plaintiffs contacted counsel for Defendants to attempt to resolve the issues presented herein without the need for a motion. As of filing time, Plaintiffs had not received a response.

DATED: January 26, 2017 Respectfully submitted,

/s/ Joy Odom

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CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2017, I filed the foregoing Motion to Strike the Expert Report and Testimony of George Caruso electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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